

EXHIBIT A

Joyce Weaver Johnson
Assistant Municipal Attorney
Municipal Attorney's Office
P.O. Box 196650
Anchorage, Alaska 99519-6650
Phone: (907) 343-4545
Fax: (907) 343-4550
E-mail: uslit@muni.org

Attorney for Defendants
Municipality of Anchorage
Anchorage Police Department
Walt Monegan
Officers Voss and Henikman

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

MONEGAN'S RESPONSES
TO PLAINTIFF'S REQUESTS FOR ADMISSIONS

Defendant Walt Monegan responds to Plaintiff's requests for admissions dated October 2, 2006, as follows:

Defendant Walt Monegan responds to Plaintiff's requests for admissions dated

October 2, 2006, as follows:

Exhibit A – Page 1

**MUNICIPALITY
OF
ANCHORAGE**

OFFICE OF THE
MUNICIPAL ATTORNEY

P.O. Box 196650
Anchorage, Alaska
99519-6650

Telephone: 343-4545
Facsimile: 343-4550

through a persons bags, purses, or belonging when such a search has not been authorized in a valid search warrant.

ANSWER:

Objection, form, compound, relevance; the question assumes department policy is the source of this principle. Notwithstanding objections, admit.

REQUEST FOR ADMISSION NO. 6: Please admit or deny there exists rules, policies, procedures, or customs and practices, defining at what point, and under what circumstances, a person detained by a police officer, acting in his/her official capacity, for the Anchorage Police Department, becomes arrested by said officer.

ANSWER:

Objection, form, compound, relevance; the question assumes the department is the source of this principle. Notwithstanding objections, admit.

REQUEST FOR ADMISSION NO. 7: Please admit or deny that during the incident on May 8, 2004, Officer Henikman placed plaintiff Carolyn Mitchell under arrest when he handcuffed her outside the Sears Mall.

ANSWER:

Deny.

REQUEST FOR ADMISSION NO. 8:

Please admit or deny that during the incident on May 8, 2004, Officer Henikman violated rules, policies, procedures, or customs and practices established by the Anchorage Police

Department, when he placed plaintiff Carolyn Mitchell in handcuffs outside the Sears Mall, without an arrest warrant.

ANSWER:

Deny.

REQUEST FOR ADMISSION NO. 9: Please admit or deny that during the incident on May 8, 2004, Officer J. Voss violated rules, policies, procedures, or customs and practices established by the Anchorage Police Department, when he pointed a weapon at plaintiff Carolyn Mitchell outside the Sears Mall.

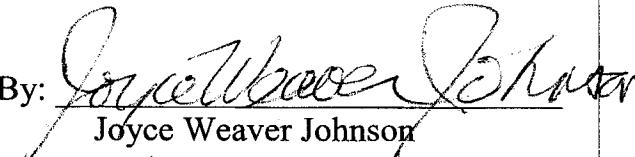
ANSWER:

Deny.

Respectfully submitted this 18th day of December, 2006.

JAMES N. REEVES
Municipal Attorney

By:


Joyce Weaver Johnson
Assistant Municipal Attorney
Alaska Bar No. 9306029

Certificate of Service

I hereby certify that I caused to be mailed a true and correct copy of this foregoing document to Isaac Derek Zorea & Moshe Calberg Zorea on December 18th, 2006.

Sheri Curro
Sheri Curro

UNICIPALITY
OF
ANCHORAGE

OFFICE OF THE
UNICIPAL ATTORNEY

P.O. Box 196650
Anchorage, Alaska
99519-6650

Telephone: 343-4545
Facsimile: 343-4550

Monegan's Responses to Requests for Admissions
Case No. 3:05-cv-00273-JWS
Page 5 of 5

Exhibit A – Page 3